

P O R T E R | S C O T T

A PROFESSIONAL CORPORATION

Matthew W. Gross, SBN 324007

mgross@porterscott.com

Jeffery M. Isaacs, SBN 338853

jisaacs@porterscott.com

2180 Harvard Street, Suite 500

Sacramento, California 95815

TEL: 916.929.1481

FAX: 916.927.3706

Attorneys for Defendants

SACRAMENTO COUNTY, and SCDC OFFICER DUGDALE

Exempt from Filing Fees Pursuant to Government Code § 6103

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

ARAM MKRTCHYAN, an individual,

CASE NO. 2:25-cv-01405-DJC-CSK

Plaintiff,

**STIPULATION AND ORDER GRANTING
PLAINTIFF LEAVE TO FILE A FIRST
AMENDED COMPLAINT AND SETTING
TIME FOR DEFENDANTS' ANSWER**

v.

SACRAMENTO COUNTY, CALIFORNIA,
THE OPERATOR OF THE SACRAMENTO
COUNTY SHERIFF'S DEPARTMENT
("SCSD"); and SCSD OFFICER DUGDALE,
and DOES 1-10, in their individual capacity,

Complaint: 05/19/2025

Defendants.

Whereas, Plaintiff had previously granted Defendants an extension of time to answer and/or otherwise respond to the Complaint by July 11, 2025;

Whereas, Defendants timely raised concerns that Count Two of the Complaint failed to state a cause of action as pleaded and that they intended to file a motion to dismiss the same;

Whereas, Plaintiff met and conferred with Defendants regarding their concerns about the pleading of Count Two of the Complaint;

Whereas, Plaintiff and Defendant Sacramento County have agreed that Plaintiff will file a First Amended Complaint by July 16, 2025, and Defendant Sacramento County will have until

1 July 23, 2025, to file its answer and/or to otherwise respond to the First Amended Complaint.

2 **Now Therefore**, it is hereby stipulated and agreed by and between Plaintiff ARAM
3 MKRTCHYAN and Defendants SACRAMENTO COUNTY, and SCDC OFFICER DUGDALE, by and
4 through their respective undersigned counsel that Plaintiff shall file a First Amended Complaint by July
5 16, 2025, and Defendants shall answer and/or otherwise respond thereto by July 23, 2025.

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7 Dated: July 14, 2025

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9 By /s/Matthew W. Gross
10 Matthew W. Gross
11 Jeffery M. Isaacs
Attorneys for Defendants

12 Dated: July 14, 2025

13 By /s/ Patrick H. Dwyer (Authorized on 7/11/25)
14 Patrick H. Dwyer
15 Attorney for Plaintiff
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ORDER

The Court, having reviewed the stipulation of the parties and finding good cause therefore, hereby Orders that:

1. Plaintiff shall file a First Amended Complaint by July 16, 2025; and
2. Defendants shall file their Answer and/or otherwise Respond by July 23, 2025.

Dated: July 14, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE